

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,
et. al.**

Defendants.

CIVIL NO. 12-2039 (GAG)

EXTENSION OF TIME TO FILE RESPONSE TO TCA'S REPORT

TO THE HONORABLE COURT:

COME NOW the COMMONWEALTH OF PUERTO RICO and the PUERTO RICO POLICE DEPARTMENT, through the undersigned counsel, and respectfully allege and pray as follows:

1. On August 21, 2017, the Technical Compliance Advisor filed his Six-Month Report of the Technical Compliance Advisor for the period of December 10, 2016 through June 9, 2017. (See Docket 609)
2. Pursuant to Paragraph 252 of the Agreement, PRPD and USDOJ have 30 days to file a response to the TCA's final report. (See Docket 60, ¶252)
3. As a result, the PRPD has until September 21, 2017 to file a response to the TCA's report. However, two weeks ago Puerto Rico was affected by the passage of Hurricane Irma which has hindered the ability for the Commonwealth to prepare a response to the TCA's Report. Moreover, Puerto Rico may be impacted by another Major Hurricane this week.

4. Consequently, the Commonwealth requests an extension of time for the PRPD to submit its response to the TCA's Report before October 12, 2017.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and grant this instant motion for an extension of time.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on September 18, 2017.

WANDA VÁZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS
Deputy Secretary in Charge of
Litigation
Department of Justice

SUSANA PEÑAGARÍCANO BROWN
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